

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JAMSHID NORIYAN (01)
a.k.a. JAMES NORIYAN
DEHSHID NOURIAN (02)
a.k.a. DAVID NOURIAN
CHRISTOPHER RYDBERG (03)
ASHRAF MOFID (04)
a.k.a. SHERRI MOFID
LEYLA NOURIAN (05)
MICHAEL TABA (07)

CRIMINAL NO. 3:17-cr-155-L

THE UNITED STATES OF AMERICA'S AMENDED EXHIBIT LIST

GX	DESCRIPTION	OFFER	DATE	
			ADMIT	N/ADM
Health Care Benefit Program Records				
A1	Department of Labor Provider Enrollment Contract for Ability Pharmacy, Inc.			
A2	Department of Labor Billing Data for Ability Pharmacy, Inc.			
A3	CVS Caremark Provider Enrollment Contract for Ability Pharmacy, Inc.			
A4	CVS Caremark Provider Enrollment Contract for Industrial and Family, LLC			
A5	Blue Cross Blue Shield Billing Data for Ability Pharmacy Inc. and Industrial and Family Pharmacy, LLC			
A6	Department of Labor Provider Enrollment Contract for Industrial and Family Pharmacy, LLC			
A7	Department of Labor Billing Data for Industrial and Family Pharmacy, LLC			
A8	Department of Labor Provider Enrollment Contract for Park Row Pharmacy, LLC			
A9	Department of Labor Billing Data for Park Row Pharmacy, LLC			
A10	CVS Caremark Provider Enrollment Contract for Park Row Pharmacy, LLC			
A11	Blue Cross Blue Shield Billing Data for Park Row Pharmacy, LLC			

GX	DESCRIPTION	OFFER	DATE	
			ADMIT	N/ADM
A12	Department of Labor Provider Enrollment Contract and EFT for Michael Taba, M.D.			
A13	Department of Labor Provider Enrollment Contract for Kevin Williams, M.D.			
A14	Department of Labor Provider Enrollment Contract for Leslie Benson M.D.			
A15	Department of Labor Remittance Voucher No. 364963			
A16	Department of Labor Remittance Voucher No. 382843			
A17	Department of Labor Remittance Voucher No. 428442			
A18	Department of Labor Remittance EOB Check #0070001010			
A19	Department of Labor Remittance EOB Check #0080010275			
A20	Department of Labor Remittance Voucher No. 445537			
A21	Department of Labor Remittance Voucher No. 676500			
A22	Department of Labor Remittance Voucher No. 694582			
A23	Department of Labor Remittance Voucher No. 712383			
A24	Department of Labor Remittance Voucher No. 730903			
A25	Department of Labor Remittance Voucher No. 748947			
A26	Department of Labor Remittance Voucher No. 189962			
A27	Department of Labor Remittance Voucher No. 186260			
A28	BCBS Small Group Business Proposal for Ability Pharmacy			
A29	BCBS Employee Enrollment Apps for Ability Pharmacy			
A30	BCBS Employer Enrollment Apps for Ability Pharmacy			
A31	DOL Ability, IFP, and Park Row Third Party Billers			
A32	Prime Therapeutics - ABILITY PHARMACY INC			
A33	Prime Therapeutics - PARK ROW PHARMACY			
A34	CVS Caremark Provider Manual - 2014			
A35	CVS Caremark Amendment to Provider Manual - Nov-July 2014			
A36	CVS Caremark Provider Manual - 2016			
A37	Prime Therapeutics - Pharmacy Provider Manual - Q1 2015			
A38	Prime Therapeutics - Pharmacy Provider Manual - Q3 2015			
A39	Prime Therapeutics Provider Manual - 2015			
A40	Optum Records			
Count 2 – M.M.				
B1	Prescriptions for M.M.			
B2	Blue Cross Blue Shield Billing Data Excerpt for M.M.			
B3	Blue Cross Blue Shield Billing Data Excerpt for M.M.			
Count 3 – A.G.				
C1	Prescriptions for A.G.			
C2	Blue Cross Blue Shield Billing Data Excerpt for A.G.			
C3	Blue Cross Blue Shield Billing Data Excerpt for A.G.			
Count 4 – R.M.				
D1	Prescriptions for R.M.			
D2	Blue Cross Blue Shield Billing Data Excerpt for R.M.			

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			ADMIT	N/ADM
D3	Blue Cross Blue Shield Billing Data Excerpt for R.M.			
Count 5 – M.C.				
E1	Prescriptions for M.C.			
E2	Benson Patient File for M.C.			
E3	Department of Labor Claims Data Excerpt for M.C.			
E4	Department of Labor Claims Data Excerpt for M.C.			
Count 6 – L.S.				
F1	Prescriptions for L.S.			
F2	Benson Patient File for L.S. (Lumbar)			
F3	Benson Patient File for L.S. (Knee)			
F4	Department of Labor Claims Data Excerpt for L.S.			
F5	Department of Labor Claims Data Excerpt for L.S.			
Count 7 – R.C.				
G1	Prescriptions for R.C.			
G2	Taba Patient File for R.C.			
G3	Department of Labor Claims Data Excerpt for R.C.			
G4	Department of Labor Claims Data Excerpt for R.C.			
Count 8 – L.B.				
H1	Prescriptions for L.B.			
H2	Taba Patient File for L.B.			
H3	Department of Labor Claims Data Excerpt for L.B.			
H4	Department of Labor Claims Data Excerpt for L.B.			
Count 9 – J.A.				
I1	Prescriptions for J.A.			
I2	Taba Patient File for J.A.			
I3	Department of Labor Claims Data Excerpt for J.A.			
I4	Department of Labor Claims Data Excerpt for J.A.			
Business Records				
J1	Blank Prescriptions for Kevin Williams (Site 1)			
J2	Kevin Williams Promissory Notes			
J3	Michael Taba Promissory Note			
J4	Handwritten Notes Regarding Leslie Benson and Michael Taba Scar Gel			
J5	Handwritten Notes Regarding Michael Taba and Jamshid Noryian Phone Numbers (Site 1)			
J6	Notes Regarding Bandoola Expenses and Income (Site 4)			
J7	Article Regarding North Texas Compounding Investigation (Site 1)			
J8	Benson Patients Sent in on December 23, 2014 (Site 2)			
J9	Email Regarding Benson Referrals April 1-Oct 16 (Site 4)			
J10	Notes Regarding Patients James Brought In (Site 2)			
J11	Ability Blank Prescriptions (Site 4)			
J12	Blank Prescriptions (Site 3)			
J13	List of Benson Temple Patients (Site 2)			
J14	Taba Surgery Schedule Referrals December 3, 2014 (Site 2)			
J15	Scanned Documents from SW (Site 1)			

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			ADMIT	N/ADM
J15-A	Report of Taba Claims (Site 1)			
J15-B	Ability All Drugs Log (Site 1)			
J15-C	Ability All Pay Plans (Site 1)			
J15-D	Email Chain from J.B. (Site 1)			
J15-E	Taba 6/5 Labels (Site 1)			
J15-F	Handwritten Notes (Site 1)			
J16	Scanned Documents from SW (Site 5)			
J16-A	Report of Benson Claims (Site 5)			
J16-B	Handwritten Notes (Site 5)			
J17	Handwritten Notes Regarding Contacting Patients (Site 1)			
J18	Medicare Fraud Training (Site 1)			
J19	Scanned Documents from SW (Site 5)			
J19-A	Handwritten Notes (Site 5)			
J19-B	Selective Rx Journal Reports (Site 5)			
J19-C	Patient Summary for K.H. (Site 5)			
J19-D	Handwritten Note (Site 5)			
J20	Report of Kevin Williams Claims March 2015 (Site 2)			
J21	Report of Michael Taba Claims February 2015 (Site 2)			
J22	Judy Bachman Bandoola Bonus Letter (Site 4)			
J23	Records Regarding HJLM Holding, LLC v. Magnum Surgical Products, LLC			
J23-A	Original Petition			
J23-B	Original Answer			
J23-C	Certified Judgment			
J24	Ability Blank Prescription Forms (Site 2)			
J25	Blank Prescription Form (Site 1)			
J26	Report of Michael Taba Claims May-June 2014 (Site 2)			
J27	Kevin Williams Commission Report February 2015 (Site 2)			
J28	Notes on Insurance (Site 5)			
J29	Notes on Compound Medication Ingredients (Site 1)			
J30	Notes on Calling on Refills (Site 1)			
J31	Letter of Intent to Michael Taba Re Lease of 411 N General Bruce			
J32	Script for Insurance Information (Site 5)			
J33	Michael Taba Department of Labor Patient List (Site 4)			
J34	Handwritten Notes Regarding Purpose of Each Pharmacy (Site 4)			
J35	Handwritten Notes Regarding Patients of Michael Taba and Leslie Benson (Site 5)			
J36	Notes Regarding Holding Companies and Properties (Site 5)			
J37	Scanned Documents from SW (Site 5)			
J37-A	Revenue by Doctor (Site 5)			
J37-B	Ledger (Site 5)			
J37-C	Rxpress Financial Notes (Site 5)			
J37-D	Check Register (Site 5)			
J37-E	Rxpress Balance Sheet (Site 5)			

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			ADMIT	N/ADM
J38	Fax from Leslie Benson's Office Regarding Cream Scripts (Site 2)			
J39	Handwritten Notes Regarding Jamshid Noryian by L.M.			
J40	Letter to James Noryian from M.M. (Site 4)			
J41	Letter to James Noryian from A.G. (Site 4)			
J42	Letter to James Noryian from R.M. (Site 4)			
J43	Fax from Dr. Taba's Office Regarding Patient Schedules (Site 5)			
J44	Fax from Dr. Taba's Office Regarding Patient Schedules (Site 2)			
J45	Prescription by Dr. M.H. for Dehshid Nourian (Site 4)			
J46	Envelope Addressed to Sherri Mofid (Site 2)			
J47	List of Expenses (Site 5)			
J48	Revenue by Doctor (Site 5)			
J49	Checks to Suppliers (Site 2)			
J50	Dr. Taba Prescriptions PART 1 of 3			
J51	Dr. Taba Prescriptions PART 2 of 3			
J52	Dr. Taba Prescriptions PART 3 of 3			
J53	Williams Prescriptions			
J54	Benson Prescriptions			
J55	Commission Report (Site 2)			
J56	Commission Report (Site 5)			
J57	Benson Blank Prescription			
J58	Williams Signed Prescription			
J59	Aguilar Prescriptions			
Text Messages				
K1	April 2016 Text Messages between Kimberly McCoy and Jamshid Noryian			
K2	May 2016 Text Messages between Kimberly McCoy and Jamshid Noryian			
K3	September 2015 Text Messages between Kimberly McCoy and Megan Marines			
K4	January 2016 Text Messages between Kimberly McCoy and Hump Van Gieson			
K5	March 2016 Text Messages between Kevin Williams and Christopher Rydberg			
Emails				
L1	Email Regarding Shuttle to Cowboys Game			
L2	Email Regarding New Clinic for Dr. Benson			
L3	Email to Mike Benson Regarding Documents from Jamshid Noryian			
L4	Email from Amoret Guadian to Melissa Driver Regarding Patient Complaint			
L5	Email form Melissa Driver Regarding No More Refills on Patient			
L6	Email form Amoret Guadian to Melissa Driver Regarding Patient Complaint			

GX	DESCRIPTION	OFFER	DATE	
			ADMIT	N/ADM
L7	Email from Melissa Driver Regarding Denied Patients			
L8	Email from Amoret Guadian to Melissa Driver Regarding Updated List of Patients We Can't Fill			
L9	Email from Mike Benson to Kimberly McCoy Regarding Script Pad			
L10	Email from Christopher Rydberg Regarding Magnum Surgical Products			
L11	Email from Melissa Driver to Amoret Guadian Regarding Decrease in Medications			
L12	Email from Amoret Guadian to Melissa Driver Regarding Helping at Dr. Taba Practice			
L13	Email from Amoret Guadian to Melissa Driver Regarding 3 Department of Labor Patients			
L14	Email from Amoret Guadian to Melissa Driver Regarding Dr. Taba Patients on Multivitamin			
L15	Email from Melissa Driver to Amoret Guadian Regarding Refill Scripts			
L16	Email from Megan Marines to Melissa Driver Regarding Dr. Taba Surgery Patients			
L17	Email from Amoret Guadian to Melissa Driver Regarding Patient R.S.			
L18	Email from Melissa Driver to Amoret Guadian Regarding Patient J.T.			
L19	Email from Melissa Driver to Amoret Guadian Regarding Patients – No Supplements			
L20	Email from Michael Taba to Counsel			
L21	Email from Kimberly McCoy to Laura Worth Regarding House Walkthrough			
Financial Records				
M1	Wells Fargo Account Ending in 6919 held in the name of Sherri Mofid			
M1-A	Signature Card for Wells Fargo Account Ending in 6919			
M1-B	September 8, 2014 Check from Sherri Mofid to Michael Taba for \$10,000			
M1-C	August 14, 2014 Cashier's Check from Sherri Mofid to Michael Taba for \$100,000			
M1-D	September 8, 2014 Cashier's Check Sherri Mofid to Michael Taba for \$90,000			
M2	Chase Account Ending in 5614 held in the name of Michael Taba			
M2-A	Deposit Slip for \$100,000 to Chase Account Ending in 5614			
M2-B	Deposit Slip for \$90,000 to Chase Account Ending in 5614			
M2-C	Deposit Slip for \$10,000 to Chase Account Ending in 5614			
M2-D	Deposit Slip for \$150,000 to Chase Account Ending in 5614			
M2-E	Deposit Slip for \$70,000 to Chase Account Ending in 5614			

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			ADMIT	N/ADM
M2-F	Deposit Slip for \$136,600 to Chase Account Ending in 5614			
M2-G	Deposit Slip for \$258,000 to Chase Account Ending in 5614			
M2-H	Withdrawal Slip for \$750,000 from Chase Account Ending in 5614			
M2-I	November 11, 2015 Check from Michael Taba to Sherri Mofid for \$50,000			
M3	Chase Account Ending in 2338 held in the name of Michael Taba			
M3-A	Signature Card for Chase Account Ending in 2338			
M4	Wells Fargo Account Ending in 9217 Held in the Name of Christopher J. Rydberg			
M4-A	Signature Card for Wells Fargo Account Ending in 9217			
M4-B	October 15, 2014 Cashier's Check from Christopher Rydberg to Michael Taba for \$150,000			
M4-C	July 8, 2015 Cashier's Check from Christopher Rydberg to Magnum Surgical Products (Kevin Williams) for \$279,000			
M5	Wells Fargo Account 7909 Held in the Name of Restaurant & Associates, Inc.			
M5-A	Signature Card for Wells Fargo Account Ending in 7909			
M5-B	November 17, 2014 Cashier's Check from Christopher Rydberg to Michael Taba for \$70,000			
M6	Wells Fargo Account Ending in 8897 Held in the Name of Bandoola Pharmaceutical, LLC			
M6-A	Signature Card for Wells Fargo Account Ending in 8897			
M6-B	Withdrawal Slip for \$136,630 from Wells Fargo Account Ending in 8897			
M6-C	February 16, 2016 Check from Bandoola Pharmaceutical to Magnum Surgical Products (Kevin Williams) for \$125,000			
M6-D	Withdrawal Slip for \$381,000 from Wells Fargo Account Ending in 8897			
M6-E	Withdrawal Slip for \$560,000 from Wells Fargo Account Ending in 8897			
M6-F	September 21, 2015 Check from Bandoola Pharmaceutical to Magnum Surgical Products (Kevin Williams) for \$219,000			
M6-G	Withdrawal Slip for \$309,010 from Wells Fargo Account Ending in 8897			
M6-H	April 22, 2015 Check to Nicolas Aguilar for \$10,000			
M6-I	December 2, 2015 Check to Nicolas Aguilar for \$10,000			
M7	Chase Account Ending in 6653 Held in the Name of Dr. Leyla Nourian			
M7-A	Signature Card for Chase Account Ending in 6653			
M7-B	Withdrawal Slip for \$108,000 from Chase Account Ending in 6653			

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			ADMIT	N/ADM
M8	Ennis State Bank Account Ending in 7903 Held in the Name of Kevin Williams			
M8-A	Signature Card for Ennis State Bank Account Ending in 7903			
M8-B	Deposit Slip for \$214,000 to Ennis State Bank Account Ending in 7903			
M8-C	Deposit Slip for \$219,000 to Ennis State Bank Account Ending in 7903			
M8-D	Deposit Slip for \$309,000 to Ennis State Bank Account Ending in 7903			
M9	Wells Fargo Account Ending in 3119 Held in the Name of HJLM, LLC			
M9-A	February 2, 2016 Check from HJLM Holding LLC to Lee Diehl for \$2,000			
M9-B	December 29, 2015 Check from HJLM Holding LLC to David McDonald for "Draw on Taba Job" for \$3,000			
M9-C	January 26, 2016 Check from HJLM Holding LLC to David McDonald for "Taba Job" for \$5,300			
M9-D	December 17, 2015 Check from HJLM Holding LLC to Jimmy Eaves for "Draw on Taba Job" for \$5,000			
M10	Wells Fargo Account Ending in 0302 held in the name of Industrial & Family Pharmacy			
M10-A	Signature Card for Wells Fargo Account Ending in 0302			
M10-B	December 1-December 15, 2015 Statement for Wells Fargo Account Ending in 0302			
M10-C	January 1-January 31, 2016 Statement for Wells Fargo Account Ending in 0302			
M11	JP Morgan Chase Account Ending in 9863 held in the name of Industrial & Family Pharmacy			
M11-A	Signature card for JP Morgan Chase Account Ending in 9863			
M11-B	January 19-29, 2016 Statement for JP Morgan Chase Account Ending in 9863			
M12	JP Morgan Chase Account Ending in 3462 held in the name of Jade and Joy, LLC			
M12-A	Signature card for JP Morgan Chase Account Ending in 3462			
M12-B	January 1-29, 2016 Statement for JP Morgan Chase Account Ending in 3462			
M12-C	May 1-29, 2015 Statement for JP Morgan Chase Account Ending in 3462			
M12-D	September 1-30, 2015 Statement for JP Morgan Chase Account Ending in 3462			
M12-E	October 30-November 30, 2015 Statement for JP Morgan Chase Account Ending in 3462			

GX	DESCRIPTION	OFFER	DATE	
			ADMIT	N/ADM
M12-F	May 30-June 30, 2015 Statement for JP Morgan Chase Account Ending in 3462			
M12-G	July 1-31, 2015 Statement for JP Morgan Chase Account Ending in 3462			
M13	Scottrade Investment Account Ending in 1793 held in the Name of Sherri Mofid			
M13-A	Signature card for Scottrade Account Ending in 1793			
M13-B	January 1-January 31, 2016 Statement for Scottrade Account Ending in 1793			
M14	Prosperity Bank Account Ending in 9542 held in the name of Ability Pharmacy, Inc.			
M14-A	Signature card for Prosperity Bank Account Ending in 9542			
M14-B	Excerpt from January 31, 2016 Statement for Prosperity Bank Account Ending in 9542			
M14-C	Excerpt from October 31, 2015 Statement for Prosperity Bank Account Ending in 9542			
M14-D	Excerpt from November 30, 2015 Statement for Prosperity Bank Account Ending in 9542			
M15	JP Morgan Chase Bank Account Ending in 2280 held in the Name of Ability Pharmacy, Inc.			
M15-A	Signature card for JP Morgan Chase Bank Account Ending in 2280			
M15-B	January 1-January 29, 2016 Statement for JP Morgan Chase Bank Account Ending in 2280			
M15-C	May 1-May 29, 2015 Statement for JP Morgan Chase Bank Account Ending in 2280			
M15-D	October 1-30, 2015 Statement for JP Morgan Chase Bank Account Ending in 2280			
M15-E	October 31-November 30, 2015 Statement for JP Morgan Bank Account Ending in 2280			
M15-F	September 1-30, 2015 Statement for JP Morgan Bank Account Ending in 2280			
M16	Wells Fargo Bank Account Ending in 6032 held in the name of Dehshid Nourian			
M16-A	Signature card for Wells Fargo Account Ending in 6032			
M16-B	January 1-31, 2016 Statement for Wells Fargo Account Ending in 6032			
M17	Prosperity Bank Account Ending in 6341 held in the name of Ability Pharmacy, Inc.			

GX	DESCRIPTION	OFFER	DATE	
			ADMIT	N/ADM
M17-A	Signature card for Prosperity Bank Account Ending in 6341			
M17-B	Excerpt from April 30, 2015 Statement for Prosperity Bank Account Ending in 6341			
M17-C	Excerpt from May 31, 2015 Statement for Prosperity Bank Account Ending in 6341			
M18	Bank of America Account Ending in 5271 held in the name of Ability Pharmacy, Inc.			
M18-A	Signature card for Bank of America Account Ending in 5271			
M18-B	October 1-31, 2015 Statement for Bank of America Account Ending in 5271			
M19	Bancorp South Account Ending in 5371 held in the name of Bandoola Pharmacy			
M19-A	Signature card for Bancorp South Account Ending in 5371			
M19-B	July 21, 2015 Statement for Bancorp South Account Ending in 5371			
M19-C	September 30, 2015 Statement for Bancorp South Account Ending in 5371			
M19-D	November 30, 2015 Statement for Bancorp South Account Ending in 5371			
M20	JP Morgan Chase Account Ending in 7273 held in the name of Jade and Joy, LLC			
M20-A	Signature card for JP Morgan Chase Account Ending in 7273			
M20-B	June 12-30, 2015 Statement for JP Morgan Chase Account Ending in 7273			
M20-C	July 1-31, 2015 Statement for JP Morgan Chase Account Ending in 7273			
M21	TD Ameritrade Account Ending in 8494 held in the name of Dehshid Nourian			
M21-A	Signature card for TD Ameritrade Account Ending in 8494			
M21-B	January 2016 Statement for TD Ameritrade Account Ending in 8494			
M22	JPMC account ending in 0481 held in the name of Sherri Mofid			
M23	BBVA Compass Acct 4076 - Park Row Pharmacy (C Rydberg)			
M24	JPMChase Acct 1940 - Nourian Dental (L Nourian)			
M25	JPMChase Acct 3691 - Ability Pharmacy (D Nourian and C Rydberg)			

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M26	Wells Fargo Acct 2629 - Park Row (C Rydberg and A Khavarmanesh)			
M27	Wells Fargo Acct 3649 - Sherri Mofid			
M28	JPMChase Acct 9472 - Michael Taba			
M29	Scottrade Acct 1792 - Sherri Mofid			
M30	Scottrade Acct 7680 - Dehshid Nourian			
M31	TD Ameritrade Acct 3760 - Sherri Mofid			
M32	Churchill Mgmt - Records (S Mofid and D Nourian)			
M32-A	Churchill Mgmt CRM Notes			
M33	JPMChase Acct 4105 - Michael Taba			
Photographs				
N1	Photo: Feds Investigate Fort Worth Based Firm (Site1)			
N2	Photo: Report of Michael Taba Claims November 2014			
N3	Photo: Ability Pharmacy (Exterior)			
N4	Photo: Ability Pharmacy (Interior)			
N5	Photo: Industrial Pharmacy (Exterior)			
N6	Photo: Industrial Pharmacy (Interior)			
N7	Photo: Park Row Pharmacy (Exterior)			
N8	Photo: Park Row Pharmacy (Interior)			
N9	Photo: Ability Pharmacy Rx Ending 057-00 (Blue Bottle) for L.S.			
N10	Photo: Ability Pharmacy Rx Ending 436-00 (White Cap/Tan Bottle) for L.S.			
N11	Photo: Ability Pharmacy (Bottles on Microwave) for L.S.			
N12	Photo: Ability Pharmacy and Industrial & Family (Blue and Clear/White Bottles) for R.C.			
N13	Photo: Louis Vuitton Handbag			
N14	Photo: BMW			
N15	Photos: Property			
Secretary of State Records				
O1	Ability Secretary of State Filings			
O2	Industrial and Family Secretary of State Filings			
O3	Park Row Pharmacy Secretary of State Filings			
O4	Bandoola Secretary of State Filings			
O5	HJLM Holding LLC Secretary of State Filings			
O6	Queen Shiva LLC Secretary of State Filings			
O7	Ace Queen LLC Secretary of State Filings			
O8	Ace King LLC Secretary of State Filings			
O9	Michael Taba M.D. Secretary of State Filings			
O10	Magnum Surgical Products LLC Secretary of State Filings			
O11	Jade and Joy LLC Secretary of State Filings			
O12	Benson Injury Clinic P.A. Secretary of State Filings			
Tax Records				

GX	DESCRIPTION	OFFER	DATE	
			ADMIT	N/ADM
P1	Ability Pharmacy 2015 Form 1120S			
P2	Ability 2015 Transcript of Account			
P3	Industrial & Family Pharmacy 2015 Form 1120S			
P4	Industrial & Family 2015 Transcript of Account			
P5	Industrial & Family Pharmacy 2016 Form 1120S Lack of Records			
P6	Park Row Pharmacy 2015 Form 1120S			
P7	Park Row 2015 Transcript of Account			
P8	Dehshid Nourian 2015 Form 1040			
P9	Dehshid Nourian 2015 Transcript of Account			
P10	Dehshid Nourian 2016 Form 1040			
P11	Dehshid Nourian 2016 Transcript of Account			
P12	Ali Khavaramanesh 2015 Form 1040			
P13	Ali Khavaramanesh 2015 Transcript of Account			
P14	Robert Ritter 2015 Form 1040			
P15	Robert Ritter 2015 Transcript of Account			
P16	Julie Ritter 2015 Form 1040			
P17	Julie Ritter 2015 Transcript of Account			
P18	Bandoola 2015 Form 1065			
P19	Bandoola 2015 Transcript of Account			
P20	Bandoola 2016 Form 1065			
P21	Bandoola 2016 Transcript of Account			
P22	HJLM 2015 Form 1065			
P23	HJLM 2015 Transcript of Account			
P24	HJLM 2016 Form 1065			
P25	HJLM 2016 Transcript of Account			
P26	Jade and Joy 2015 Form 1065			
P27	Jade and Joy 2015 Transcript of Account			
P28	Jade and Joy 2016 Form 1065			
P29	Jade and Joy 2016 Transcript of Account			
P30	Christopher Rydberg 2015 Form 1040			
P31	Christopher Rydberg 2015 Transcript of Account			
P32	Jamshid Noryian Form 1040 for 2015 & Transcript of Account Lack of Records			
P33	Ability 2016 Form 1120S			
P34	Ability 2016 Transcript of Account			
P35	Park Row 2016 Form 1120S			
P36	Park Row 2016 Transcript of Account			
P37	Dehshid & A Pirnajmeddin Nourian 2015 Form 4549			
P38	Ali & Mastaneh Sarra Khavaramanesh 2015 Form 4549			
P39	Robert Ritter 2015 Form 4549			
P40	Julie Ritter 2015 Form 4549			
P41	2015 General Ledger for Industrial & Family Pharmacy			

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			ADMIT	N/ADM
P42	2016 General Ledger for Industrial & Family Pharmacy			
P43	2015 General Ledger for Park Row Pharmacy			
P44	2016 General Ledger for Park Row Pharmacy			
P45	Park Row 2015 BBVA Compass and Wells Fargo bank records 2015			
P46	2015 Industrial & Family Pharmacy – Signature Form – Form 8879-S			
P47	2016 Industrial & Family Pharmacy – Signature Form – Form 8879-S			
P48	2015 Park Row Pharmacy – Signature Form – Form 8879-S			
P49	2016 Park Row Pharmacy – Signature Form – Form 8879-S			
P50	2015 General Ledger for Ability Pharmacy			
P51	Transaction Logs for 8 Cashier's Checks from Bank of America Account Ending in 5271			
P52	Dehshid Nourian Form 1040 2015			
P53	Dehshid Nourian Form 1040 2016			
P54	2015 Dehshid Nourian – Signature Page – Form 8879			
P55	2016 Dehshid Nourian – Signature Page – Form 8879			
P56	Chase 2015 Expenses			
Recordings				
Q1	Recorded Conversation – James Noryian and Jared Haggard 10.05.15			
Q1-A	Transcript of Recorded Call – J. Noryian and J. Haggard 10.05.15			
Q1-B	Subtitled Recording – J. Noryian and J. Haggard 10.05.15			
Q2	Recorded Conversation – Dehshid Nourian and Jeff Byrum 01.26.16			
Q2-A	Transcript of Recorded Call – D. Nourian and J. Byrum 01.26.16			
Q2-B	Subtitled Recording – D. Nourian and J. Byrum 01.26.16			
Q3	Recorded Conversation – James Noryian and Rey Moreno 06.28.16			
Q3-A	Transcript of Recorded Call – J. Noryian and R. Moreno 06.28.16			
Q3-B	Subtitled Recording – J. Noryian and R. Moreno 06.25.16			
Mail Records				
R1	Mailbox Service Agreement Signed by Leyla Nourian			
Summary Charts				
S1	DOL Claims Data Combined			

GX	DESCRIPTION	OFFER	DATE	
			ADMIT	N/ADM
S1-A	DOL Totals – Ability Pharmacy			
S1-B	DOL Prescriptions Over Time – Ability Pharmacy			
S1-C	DOL Totals – Industrial & Family Pharmacy			
S1-D	DOL Prescriptions Over Time – Industrial & Family			
S1-E	DOL Totals – Park Row Pharmacy			
S1-F	DOL Prescriptions Over Time – Park Row Pharmacy			
S1-G	DOL Claims Submitted Through Third-Party Billers			
S1-H	DOL Total Billed for Every Pharmacy			
S1-I	DOL Total Paid to Every Pharmacy			
S2	Money Laundering Combined			
S2-A	DOL Deposits to Pharmacy			
S2-B	Count 11 Wire Transfer			
S2-C	Count 11 Cashier's Checks			
S2-D	Count 12 Online Transfer			
S2-E	Count 13 Wire Transfer			
S2-F	Counts 11–13 Transfer			
S2-G	Count 14 Wire Transfer			
S2-H	Count 14 Cashier's Checks			
S2-I	Count 15 Online Transfer			
S2-J	Count 16 Wire Transfer			
S2-K	Cashier's Checks			
S2-L	Counts 14–16 Transfer			
S2-M	Payments to Michael Taba w/o Repayments			
S2-N	Payments to Michael Taba w/ Repayments			
S2-O	Other Payments			
S2-P	Assets Purchased			
S2-Q	Payments to Kevin Williams			
S3	BCBS Claims Data Summary - Ability Pharmacy - All Claims			
S4	BCBS Claims Data Summary - Ability Pharmacy - Employee Benes			
S5	Reported vs Actual Expenses			
S6	Cashier's Check 7 Example			
S7	Cashier's Check 76 Example			
S8	Cashier's Check 137 138 Example			
S9	Cashier's Check 183 184 185 Example			
S10	Cashier's Check 205 Example			
S11	Cashier's Checks Purchased and Expensed			
Physical Exhibits				
T1	Prescription Pain Cream Medication Tube			
T2	Prescription Vitamins Bottles			
T3	Louis Vuitton Handbag			

Respectfully submitted,

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